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Attorneys for Defendants  
UBER TECHNOLOGIES, INC. and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MARTHA L.  
GOODMAN IN SUPPORT OF  
DEFENDANTS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
THEIR MOTION *IN LIMINE* NO. 2  
AND WAYMO'S BRIEF IN  
OPPOSITION THERETO**

Judge: The Honorable William Alsup  
Trial Date: October 10, 2017

I, Martha L. Goodman, declare as follows:

1. I am an attorney with the law firm of Boies Schiller Flexner LLP representing Defendants Uber Technologies Inc. and Ottomotto LLC (collectively, “Uber”) in this matter. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendants’ administrative motion for an order to file under seal certain exhibits to Defendants’ Motions *in Limine* No. 2 and Waymo’s Brief in Opposition to Defendants’ Motion *in Limine* No. 2.

2. I have reviewed the following exhibits and only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit 4 to the Declaration of Martha L. Goodman in Support of Defendants’ Motions In Limine Nos. 2 and 22-25 (“Goodman Decl.”)	Entire Document	Plaintiff

3. The entirety of Exhibits 4 to the Goodman Decl. contains information that Waymo designated or considers “Confidential” and/or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order in this case, or that Waymo asked Uber to file under seal.

4. Uber’s request to seal is narrowly tailored to the portions of Defendants’ motions *in limine* and its supporting papers, as well as to the portions of Waymo’s briefs in opposition to Defendants’ motions in limine and Waymo’s supporting papers, that merit sealing.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 13th day of September, 2017 at Washington, D.C.

Dated: September 13, 2017

BOIES SCHILLER FLEXNER LLP

By: /s/ Martha L. Goodman  
Martha L. Goodman

**ATTESTATION OF E-FILED SIGNATURE**

I, Karen L. Dunn, am the ECF User whose ID and password are being used to file this document. In compliance with General Order 45, X.B., I hereby attest that Martha L. Goodman has concurred in this filing.

Dated: September 13, 2017

/s/ Karen L. Dunn

Karen L. Dunn